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Sable Offshore Corp.*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

CENTER FOR BIOLOGICAL  
DIVERSITY; WISHTOYO  
FOUNDATION,

Plaintiffs,

v.

DEBRA HAALAND, Secretary of the  
U.S. Department of the Interior;  
BUREAU OF SAFETY AND  
ENVIRONMENTAL  
ENFORCEMENT; BRUCE HESSON,  
Pacific Regional Director, Bureau of  
Safety and Environmental  
Enforcement,

Defendants.

CASE NO. 2:24-cv-05459-FMO-MAA

**SABLE OFFSHORE CORP.'S  
NOTICE OF MOTION AND MOTION  
TO INTERVENE**

Hearing

Date: November 14, 2024  
Time: 10:00 a.m.  
Judge: Hon. Fernando M. Olguin  
Courtroom: 6D

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on November 14 at 10:00 a.m., or as soon thereafter as the matter may be heard before the Honorable Fernando M. Olguin in Courtroom 6D of the United States District Court, Central District, Western Division of California, located at 350 W 1<sup>st</sup> Street, Suite 4311, Los Angeles, CA 90012-4565, Proposed Intervenor-Defendant Sable Offshore Corp. (“Sable”) pursuant to Federal Rule of Civil Procedure 24, will and hereby does respectfully move the Court for an order granting Sable’s intervention as a defendant.

This motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on October 9, 2024. The Federal Defendants take no position on Sable’s intervention. The Plaintiffs have not yet provided a position.

This motion is made on the basis that as the owner of the challenged offshore oil and gas leases, Sable is entitled to intervention as of right under Federal Rule of Civil Procedure 24(a)(2). Sable’s motion is timely. Sable has significant, legally protectable interests at stake in this action, and a decision in Plaintiffs’ favor could significantly impair Sable’s interests given that Plaintiffs seek vacatur of the federal agency’s decision to authorize extensions to resume operations on Sable’s oil and gas leases. Finally, Sable’s unique, private interests in the federal approval are not adequately represented by the Federal Defendants in this action. Alternatively, the Court should grant Sable permissive intervention under Federal Rule of Civil Procedure 24(b). In accordance with Federal Rule of Civil Procedure 24(c), Sable has lodged a [Proposed] Answer of Intervenor-Defendant concurrently with this motion.

This motion is made pursuant to this Notice of Motion and Motion to Intervene, the accompanying Memorandum of Points and Authorities, the concurrently filed Declaration of Steven P. Rusch, the Certificate of Interested Parties filed pursuant to Local Rule 7.1-1, the pleadings and records on file herein, and upon all other arguments and evidence that may be presented to this Court.

1 Dated: October 16, 2024

Respectfully submitted,

2 LATHAM & WATKINS LLP

3 By: /s/ Daniel P. Brunton

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